

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

Request of SBC Communications Inc.)	
For Extension of the Effective Date of)	CC Docket No. 98-67
Section 64.604(a)(3)(vi)(1) of)	CG Docket No. 03-123
the Commission's Rules)	

**SBC COMMUNICATIONS INC. REQUEST FOR EXTENSION
OF EFFECTIVE DATE**

SBC Communications Inc. ("SBC"), hereby requests an extension of the effective date of Section 64.604(a)(3)(vi)(1), adopted by the Commission in the *Second Improved TRS Order*,¹ which requires TRS providers to offer call release for TTY-to-TTY calls. Specifically, SBC requests that the Commission allow SBC an additional six months to comply with the call release requirement. As discussed further below, special circumstances exist warranting a grant of the extension requested here.

I. BACKGROUND

In general, TTY users contact other TTY users directly without the assistance of a Communications Assistant ("CA"). However, assuming a TTY user desired assistance from a TRS Relay Center to establish a TTY-to-TTY call, the call would flow as follows: the originating TTY user would dial 711 to connect to a TRS relay center. The CA would then connect the caller to another TTY user through an additional line. Once the connection is established, the CA would drop off of the call.

¹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Second Report and Order, Order on Reconsideration, and Notice of Proposed Rulemaking, CC Docket No. 98-67; CG Docket No. 03-123, FCC 03-123, 18 FCC Rcd 12379, ¶ 68, 69 (June 17, 2003) (*Second Improved TRS Order*).

In the *Second Improved TRS Order*, the Commission concluded that TRS call release functionality is necessary to provide functionally equivalent telecommunications service for TRS users.² Based on the record, and the fact that many State TRS programs and TRS providers already offer TRS call release, the Commission concluded that TRS call release is technologically feasible and mandated that all TRS providers provide such functionality within six months of publication of the Order in the Federal Register.³ The Order was published on August 25, 2003, resulting in an implementation date of February 24, 2004.

After release of the *Second Improved TRS Order*, SBC determined that its Michigan and Kansas Relay Centers are incapable of providing call release for TTY-to-TTY calls. Currently, in SBC's Kansas relay center, the existing switch allows the CA to set up a TTY-to-TTY call, but does not permit the CA to drop off the call. Further, the switch does not have the capability to monitor a TTY-to-TTY call in the event the CA does not release the call, which is necessary to determine when the call is terminated for proper billing. In Michigan, the existing switching technology employed does not even permit the CA to set up a TTY-to-TTY call.

Rather than upgrade the technology in both wire centers to provide call release, SBC determined that it would be most economical and efficient to (1) upgrade the technology in the Kansas Relay Center to provide the call release functionality, and (2) use this upgraded technology to serve the Michigan Relay Center as well. Further, under this solution, all TRS calls, including TTY-to-TTY calls, received by the Michigan Relay Center would be served by the switch in the Kansas Relay Center.

To comply with the Commission's call release requirements, SBC determined, after extensive consultation with third party vendors, that it must design and develop a TTY-to-TTY

² *Id.*

³ *Id.*

server, along with the necessary software, to connect a TTY-to-TTY call and monitor the call once the CA drops off of the line. Specifically, the server would monitor the call to determine when the call is terminated, prepare and complete the billing record for the call and transfer the billing record to the billing server. Thus, a TTY-to-TTY call would work as follows under this process: the CA would connect the two TTY users, engage the TTY-to-TTY server by transferring the call to the server, and drop off of the call. The server would then track the length of the call and initiate and finalize the billing for the call.

SBC has entered a contractual arrangement with a third party vendor, Omega Products Corporation (“OPC”), to design and develop the TTY-to-TTY server and software necessary to provide call release functionality in the Kansas Relay Center. Based on the development and implementation schedule provided by OPC, SBC estimates that it will take approximately six months to implement this solution, and thus is seeking a limited extension of Section 64.604(a)(3)(vi)(1) until August 23, 2004. The development and implementation schedule, along with a description of the tasks, is provided below.

TASK	DURATION	START DATE
Development of Functional Requirements Document	60 DAYS	12/1/03
Develop & Test TTY to TTY module for Call Controller Client Servers	30 DAYS	2/16/04
Develop & Test the TTY to TTY module for the CARS software	30 DAYS	3/29/04
Modify the OAD Server Software to generate billing records	45 DAYS	5/10/04
Installation of TTY to TTY Software	10 DAYS	7/12/04
Switch Configuration	10 DAYS	7/26/04
Integration and Cut-over	3 DAYS	8/9/04

- (1) **Development of Functional Requirements Document:** Omega will develop a blueprint that will specify the software necessary to ensure that TTY-to-TTY calls are handled properly.
- (2) **Development and Testing of the TTY-to-TTY Module for Call Controller Client Server:** Omega will develop and test the software necessary to handle TTY-to-TTY calls.
- (3) **Development and Testing of the TTY-to TTY Module for the Communications Assistant Relay System (CARS) software:** The CARS software is used by CAs to handle TRS calls. Omega will perform testing to ensure that once a call is received by a CA, there is no significant time lapse between the set up of the call and the engagement of the server.
- (4) **Modification of the Operator Assistance for the Deaf (OAD) Server Software:** This task will ensure that the server accurately monitors the call for proper billing, and that the switch releases the connection once the call is terminated.
- (5) **Installation of the TTY-to-TTY Software:** Once Omega develops, designs and tests the foregoing software, Omega will install and test it on the server.
- (6) **Switch Configuration:** This task entails configuring the switch to send messages on the status of TTY-to-TTY calls.
- (7) **Integration and Cut-Over:** SBC, along with Omega, will do its final testing to ensure the server, software and switch are working in tandem.

II. DISCUSSION

The limited extension requested here is warranted. There is no viable workaround to provide call release in SBC's relay centers. SBC considered the only other alternative, where a CA that receives a request for call release would set up the call, leave its station (i.e. maintain the connection on the call, but physically get off of the line) and sign-in at a different location to handle incoming TRS calls. This option, however, proved problematic for several reasons. First, it would be inefficient. It would tie up two CA calling positions, rather than one, for an unpredicted amount of time, adversely affecting the Commission's requirements regarding speed of answer and call set up time. Further, it would extremely limit the number of calls that could be handled by the relay centers. Second, it most certainly could result in over-billing for TTY

users. A CA would be unable to determine when the call is terminated, because the CA would have to leave his or her terminal when the call is connected. The CA would then have to check back every few minutes or so to determine the status of the call, resulting in users potentially being charged for excess minutes of use.

SBC recognizes that the Commission has afforded the industry six months to comply with this requirement. After release of the *Second Improved TRS Order*, SBC soon thereafter determined its inability to comply with the call release functionality and immediately began the process of determining the most feasible and economical solution. After extensive discussions with third party vendors, SBC concluded that the solution proposed herein is the most viable method for updating its technology to provide the call release functionality in both relay centers. SBC then followed its internal processes for obtaining funding for the project, solidified the implementation schedule set forth above and commenced implementation of the schedule on December 1, 2003.

Grant of the six-month extension requested herein would not prove harmful to TTY users. In SBC's experience, TTY users rarely, if ever, request TTY-to-TTY call release from its relay centers. In fact, SBC has no record of receiving any requests for TTY-to-TTY call release in its Michigan Relay Center, and less than 15 requests per month in its Kansas Relay Center. The new call release requirement is not likely to change this result because TTY users already have the ability to contact each other directly. Therefore, CA involvement for TTY users is most often not necessary for TTY users to communicate with one another (or to connect to each other). Given these facts, a limited extension of Section 64.604(a)(3)(vi)(1) is warranted.

III. CONCLUSION

SBC respectfully requests that the Bureau expeditiously grant its request, allowing SBC an additional six months to comply with Section 64.604(a)(3)(vi)(1).

Respectfully Submitted,

/s/ Davida M. Grant

Davida M. Grant

Gary L. Phillips

Paul K. Mancini

SBC Communications Inc.

1401 Eye Street, NW

Suite 400

Washington, D.C. 20005

Phone – 202-326-8903

Fax – 202-408-8745

Its Attorneys

January 20, 2004